

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

**BOBBY BLAND, DANIEL RAY CARTER,  
JR., DAVID W. DIXON, ROBERT W.  
MCCOY, JOHN C. SANDHOFER, and  
DEBRA H. WOODWARD**

**Plaintiffs,**

**CASE NO. 4:11-CV-45**

**v.**

**B.J. ROBERTS, individually and in his official  
capacity as Sheriff of the City of Hampton,  
Virginia**

**Defendant.**

**DECLARATION**

I, Bobby Bland, having direct knowledge of the information set forth herein, hereby depose and declare as follows:

1. I am a citizen and resident of the Commonwealth of Virginia and the United States. I maintain my principal residence at 20 Kettering Lane, Hampton, Virginia 23666. I was employed by the Hampton Sheriff's Office from November, 2000, to December, 2009, in an administrative, non-uniformed, non-sworn administrative position.

2. The supervisor I was most closely associated with, and the person I was closest to in the Hampton Sheriff's Office, was Debra Davis, the Director of Administration in the office. My closeness to Davis was well-known among the Sheriff's senior staff and the Sheriff himself.

3. In November 2009, Sheriff Roberts was up for re-election for the office of Sheriff of the City of Hampton, Virginia. He had served in the office since the early 1990s. The Sheriff is assisted by senior officers including a colonel, two majors, at least two captains, and several lieutenants. These officers are appointed by the Sheriff and serve at his pleasure.

**Exhibit 10**

4. In my position within the Administration Division, my job was simply to track finances, including receipts and expenditures, purchase orders, requisitions and assist in the budget planning process. While I was responsible for the quality and accuracy of my work, I was not responsible for the financial condition or records of the Hampton Sheriff's Office as that responsibility fell to my immediate supervisor. I did not have access to and was not responsible for any information that was not completely available to the public through the Virginia Freedom of Information Act and other avenues.

5. I supported Jim Adams' campaign for Sheriff in 2009.

6. Debra Davis, my supervisor, mentor, and close friend, left her position with the Hampton Sheriff's Office in 2008 and become the treasurer of Jim Adams' campaign for Sheriff of the City of Hampton in early 2009.

7. In prior years and, in fact, in all years prior to 2009, I actively supported Sheriff Roberts in his efforts for re-election to his office. In the past, I had worked the polls, handed out fliers, placed yard signs at various locations throughout the City of Hampton, attended campaign events, sold tickets, bought tickets, etc.

8. In 2009, I was solicited by Major Wells-Major to provide some of these various forms of support for Sheriff Roberts. I declined to do so.

9. At all times during my employment within the Hampton Sheriff's Office, I performed my duties in an exemplary manner. I always received "above average" performance evaluations and had never been admonished or disciplined for any performance deficiencies or any type of infractions. I was never counseled or warned about anything by anyone within the Hampton Sheriff's Office.

I declare under penalty of perjury that the foregoing is true and correct.

12/22/11

Date

  
BOBBY BLAND